UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION MDL No. 2738

NOTICE OF DEFENDANT PERSONAL CARE PRODUCTS COUNCIL'S MOTION TO DISMISS

Return Date: March 6, 2017 at 9:00 a.m.

ORAL ARGUMENT REQUESTED

DEFENDANT PERSONAL CARE PRODUCTS COUNCIL'S NOTICE OF ITS MOTION TO DISMISS

PLEASE TAKE NOTICE that at 9:00 a.m. on March 6, 2017, or such other time and date set by the Court, Defendant Personal Care Products Council, by its undersigned counsel, will move before the Honorable Freda L. Wolfson, U.S.D.J., United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Room 2020, Trenton, NJ 08608, for an entry of an Order granting Defendant Personal Care Products Council's Motion to Dismiss Plaintiffs' Complaints.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Defendant

Personal Care Products Council will rely on the Memorandum of Law and the accompanying

Declaration of Mark A. Pollak and the attached exhibits submitted herewith. A proposed form of

Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendant Personal Care Products Council requests oral argument on its motion.

Dated: February 6, 2017 Respectfully submitted,

/s/ Thomas T. Locke, Esq.

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